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# SOIL MANAGEMENT PLAN (SMP)

## Former Pechiney Cast Plate, Inc. Facility

### Vernon, California

#### 1.0 INTRODUCTION

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler; formerly AMEC), has prepared this soil management plan (SMP) on behalf of Pechiney Cast Plate, Inc. (Pechiney), for the former Pechiney property located at 3200 Fruitland Avenue, in Vernon, California (the site; Figure 1). The former Pechiney property has been subdivided into two ~~areas-properties~~ known as the North Property (Assessor Parcel Numbers [APNs] 6310-008-020 and 6310-008-021) and the South Property (APNs 6310-008-010, 6310-008-011, and 6310-008-019) as shown on Figure 2.

The North Property encompasses approximately 633,191 square feet of real estate and the South Property encompasses approximately 552,715 square feet of real estate. The future uses of the North Property and the South Property ~~have not been proposed, but will be consistent of with commercial/industrial land use~~ as described in the Land Use Covenant and Agreement for Environmental Restrictions (*reference pending*). The future uses may include warehouse distribution center and industrial manufacturing.

The SMP is intended to be a plan that describes the protocols for handling and managing soil, including soil containing residual concentrations of chemicals of concern (COCs) following site remediation that may be encountered during future site grading and construction conducted during redevelopment of the respective properties. Depending on the timing of the planned redevelopments, this SMP may need to be revised to reflect the current state of development of the property, current state and federal requirements, and current property conditions.

#### 2.0 SITE BACKGROUND AND REMEDIATION GOALS

Remedial investigations conducted at the site identified volatile organic compounds (VOCs), petroleum hydrocarbons (as Stoddard solvent), polychlorinated biphenyls (PCBs), and metals (primarily arsenic) in soil; VOCs and Stoddard solvent in soil vapor; and PCBs in concrete building floor slabs at concentrations of potential concern. The investigations also identified VOCs, including trichloroethene and tetrachloroethene, in groundwater beneath the site. Groundwater is present at a depth of approximately 140 to 150 feet. Remedial investigation and screening level human health risk assessment (HHRA) findings for the site are summarized in the Feasibility Study (AMEC, May 2012). Based on the HHRA, site-specific remediation goals were established for the COCs in soil vapor, and soil at the site assuming

that the future land use would be for commercial/industrial purposes. The site-specific soil remediation goals are summarized in Table 1.

Pursuant to a July 2010 Imminent and Substantial Endangerment Determination and Consent Order, a Remedial Action Plan (as amended, the "RAP") was prepared and implemented to mitigate concrete, soil, and groundwater impacts at the site under the oversight of the Department of Toxic Substances Control (DTSC). Pursuant to the Code of Federal Regulations (CFR), Title 40, Subchapter R, Toxic Substances Control Act (TSCA), the US Environmental Protection Agency (US EPA) has oversight for PCB-impacted soil and concrete. Mitigation of the PCB-impacted concrete and soil was approved by the US EPA. Based on site-specific remediation goals developed for COCs present in concrete and soil at the Property site, these impacted media were mitigated to meet the site-specific remediation goals presented in the RAP. Remediation of VOC-impacted soil on the Northern Property and Stoddard solvent-impacted soil on the Southern Property is being mitigated by soil vapor extraction (SVE) and SVE/bioventing, respectively. Groundwater monitoring is also ongoing at the site. The well fields for the SVE and SVE/bioventing areas and existing groundwater monitoring wells are shown on Figure 3.

As detailed in the Completion Reports (AMEC, 2014a, b, c, and d), soil within portions of the Property site, to a depth of 15 feet or more below the native grade, contain hazardous substances, which include the COCs listed in Section 34.0 below. Native grade was relative to the elevation of the asphalt surface that runs along the eastern side of the site. Native grade elevations used are shown on Figure 2. Soil removals completed at the site during the implementation of the RAP are summarized below by Phase area, and residual concentrations of COCs remain in place below the remediation goals.

- Phase I Area - soil removals were conducted for PCBs and for isolated occurrences of total petroleum hydrocarbons (TPH) in soil (based on field conditions, proximity to below grade structures that were removed, or due to the presence of PCBs).
- Phase II - soil removals were conducted for PCBs and metals and for isolated occurrences of TPH in soil.
- Phase III, IV, and VI Areas - soil removals were conducted for PCBs and metals (arsenic) and for isolated occurrences of TPH in soil (based on field conditions, proximity to below grade structures that were removed, or due to the presence of PCBs). Soil impacted with TPH and Stoddard solvent was not removed in the area where SVE/bioventing is being used to address TPH- (as Stoddard solvent) and associated VOC-impacted soils; and some soil containing TPH was removed in the Phase IV Area.
- Phase V - soil removals were conducted for metals, PCBs and TPH.

In addition, soil remains in place at depths greater than 15 feet below native grade with PCB concentrations above 23 milligrams per kilogram (mg/kg). As approved by US EPA, these areas are covered with a physical underground warning barrier (UWB) that consists of concrete slurry covered with an orange fabric. The locations of these underground warning barriers are shown on Figure 34.

The Completion Reports (AMEC, 2014a, b, c, and d), also provided documentation of the below demolition work conducted at the site. The below grade demolition work included the removal of footings, foundations, structures (in the upper 10 feet), and underground utilities (within the upper 3 feet). Locations where structures were left in place at a depth of 10 feet relative to native grade are shown on Figure 4.

### **3.0 ANTICIPATED CONSTRUCTION ACTIVITIES**

The site is currently graded for storm water controls, fenced, and vacant. The site grade and post-demolition storm water controls in place at the site are shown on Figure 5. As part of the below grade demolition work, concrete containing PCBs at concentrations less than or equal to 1 mg/kg (to non-detect levels) was crushed onsite and used as backfill and surface cover in portions of the site. The areas where crushed concrete was used in this manner is shown on Figure 6.

Future redevelopment plans are near completion (South Property) or in conceptual stage of design (Northern Property). Future redevelopment will likely include a warehouse distribution center (Southern Property) and industrial manufacturing facility (North Property). In either case, not known, but may redevelopment may require over-excavation and recompaction of site soils (including native soil and imported soils); construction excavations for footings, foundations and utility corridors; and/or import of fill soils for structural or other purposes. If imported fill is needed, the import fill requirements shall meet those described in Section 45.5. If impacted soils are encountered during earthwork (grading or excavations), the soil must be managed for potential off-site disposal or stockpiled for potential onsite re-use as described in Section 45.3.

### **34.0 CHEMICALS OF CONCERN**

This section described the COCs that may be present at the site, and impacted soil may be encountered during site grading, construction, and redevelopment work. The COCs that may be encountered in soil include:

- Total petroleum hydrocarbons (TPH and as Stoddard solvent);
- PCBs;

- VOCs, such as chloroform, PCE and TCE in the North Property area, and 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene in the South Property area; and
- Metals (primarily arsenic).

The areas of the site where these COCs remain in place in soil after implementation of the RAP are shown on Figure 7. The presence of these COCs in soil at the site shall be considered during site grading and construction excavation. In consideration of the depth to groundwater (140 to 145 feet below grade), groundwater management during construction is not anticipated; but will be decided on a project-specific basis.

## **45.0 SOIL MANAGEMENT**

This section provides procedures for monitoring, soil testing, equipment decontamination, managing and testing of soil stockpiles, import fill soil requirements, and site access, all of which shall need to be implemented in the event earth work is being conducted in areas with residual COCs remaining at concentrations below or above exceeding the remediation goals (Table 1), or if impacted soil is encountered during redevelopment.

### **5.1 SOIL AND CONCRETE CONTAINING PCBs AND OTHER COCs**

For the Property site, where PCBs were a COC, remediation goals were established for PCBs at a certain depth intervals, ground surface to 5 feet below native grade (above 178 feet mean sea level [MSL]), 5 feet to 15 feet below native grade (178 to above 168 feet MSL), and below 15 feet below native grade (below or equal to 168 feet MSL). *(Note - The native grade surface elevation of 178 feet MSL in the Phase V area is lower than the remainder of the site, and depth intervals for this Phase area began at native grade).* Refer to Figure 2 for the native grade surface elevations used PCB depth intervals. Because these remediation goals are depth-specific relative to native grade, earthwork must be conducted in a manner in which soil from each respective layer is not mixed with a layer that contains soil mitigated to a less-restrictive remediation goal. Restated, deeper soil intervals shall not be mixed or co-mingled with a shallower soil interval and placed in the shallower interval ("segregation approach").

Soil within the upper 5 feet relative to native grade (above 178 feet MSL) may contain PCBs at concentrations below 3.5 mg/kg, and for this depth interval soil may be disturbed during site grading with no further sampling or onsite management, including those areas designated as landscaped areas. Areas where disturbance occurs shall be documented and surveyed.

As an alternative to the segregation approach, soil between 5 feet and above 15 feet (relative to native grade; interval of 178 feet MSL to above 168 feet MSL) that is disturbed during site grading or during construction of footing, foundations, or utility trenches may be placed under the footprint of a building slab or concrete paved area (with a minimum concrete thickness of

6-inches). In doing so, these soils shall be designated as containing PCBs at a concentration greater than 50 mg/kg. Areas where these soils are placed shall be documented and surveyed.

In the area of the UWBs (at a depth of 15 feet or greater (at 168 feet MSL or deeper; Figure 4), soil (or concrete) remains in place below the UWB with PCBs concentration above the site-specific remediation goals. The UWB or underlying soil shall not be disturbed or moved. If these areas are disturbed, then soil and concrete shall be removed for disposal based on in situ PCB concentrations recorded during the implementation of the RAP.

In addition, crushed concrete that was used on site as backfill and surface cover may contain PCBs at concentrations less than or equal to 1 mg/kg (Figure 5). These materials shall be maintained onsite.

Soils containing other COCs, such as TPH (and/or Stoddard solvent), shall be maintained in the area where the soil is disturbed and not relocated to another area or other portion of the site that is not impacted.

## **5.2 MONITORING REQUIREMENTS**

This section describes monitoring measures for future site work where visibly stained soil is observed or where potentially TPH- or VOC-impacted soils may be discovered or encountered during site grading and construction excavation. ~~General~~ Control and monitoring methods for VOC emissions (if encountered) and dust generation are included in this section. While these elements are discussed in this section, all other potentially applicable laws and regulations shall be considered prior to beginning earthwork at the site.

### **5.2.1 SCAQMD Rule 1166 Requirements**

Soil at the site may require VOC monitoring in accordance with South Coast Air Quality Management District requirements (e.g., SCAQMD Rule 1166). Monitoring for the presence of VOC-impacted soil and implementing a VOC-impacted soil mitigation plan approved by the SCAQMD Executive Officer will be required if VOC-impacted soil is encountered during grading and excavation work. A copy of the plan must be on site during the entire excavation period, and the provisions for monitoring and reporting under the Rule 1166 permit/plan must be implemented.

~~If VOC-impacted soil as defined under Rule 1166 is detected during site work, the approved mitigation plan must be implemented and the SCAQMD Executive Officer must be notified within 24 hours of its detection. VOC-impacted soil must be segregated from non-VOC impacted soil and be vapor suppressed in compliance with Rule 1166.~~

### 5.2.2 Fugitive Dust

Dust and odor control measures during site grading and excavation shall be implemented to prevent airborne dust from leaving the site boundary, in accordance with SCAQMD regulations. Conditions shall be evaluated and the adequacy of dust control measures, as based on real-time monitoring and SCAQMD Rule 403, shall be evaluated. The following dust mitigation measures may be implemented if real-time monitoring for fugitive dust exceeds the action level or if observations of visible dust emissions at the site boundary are made.

- Apply water spray or mist during activities such as excavation or stockpile management to minimize the generation of visible dust;
- Have a water supply available continuously;
- Cover soil stockpiles;
- Minimize open excavations;
- Use tarpaulin or other covers for truck carrying soils that travel on public streets;
- Keep the drop heights to a minimum, during the handling of materials or loading of transportation vehicles;
- Keep vehicle speeds on the property below 5 miles per hour; and
- Reduce the pace of work.

Construction procedures or dust control measures may be altered based on observations of the effectiveness of such measures. Work must stop until such measures are improved or additional or more effective measures are employed. Additional air monitoring may be conducted to confirm the effectiveness of emission reduction activities.

### 5.2.3 Storm Water Controls

Prior to construction activities, the contractor, in cooperation with the property owner, shall obtain a general construction permit for storm water and erosion control measures under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ (General Permit).

During construction activities, the contractor shall implement a Storm Water Pollution Prevention Plan (SWPPP).

## 5.3 SOIL TESTING AND EQUIPMENT DECONTAMINATION

If impacted soil is observed (based on visual staining, odors, or other observations), soil sampling and analysis for TPH, PCBs, metals and VOCs shall be conducted to assess the

presence of these COCs at concentrations above the ~~screening levels~~remediation goals (Table 1). If impacted soil is encountered that exceeds the soil remediation goals ~~screening levels~~ and to the extent the impacted soil requires excavation and offsite disposal, additional soil sampling shall be conducted under the supervision of a Professional Geologist (PG) or Civil Engineer (PE) registered in the State of California experienced in performing environmental investigations.

The number of, and the methods used to collect the soil samples and the analyses to be performed shall be selected in the field by the supervising PG or PE. The analytical suite shall be selected based on field observations, and may include the following test methods:

- TPH with carbon chain range quantification (TPHcc) using EPA Method 8015M (Modified);
- PCBs using EPA Method 8082 (using soxhlet extraction method 3540C);
- Metals using EPA Methods 6010B/7242; and
- VOCs using EPA Method 8260B and field preservation Method 5035.

Samples shall be collected in glass jars or brass tubes, which shall be sealed, uniquely labeled, and stored in an ice chest filled with ice to keep the samples chilled. The samples shall be shipped to an analytical laboratory accredited by the California State Water Resources Control Board Environmental Laboratory Accreditation Program~~State of California, Department of Public Health under their Environmental Laboratory Accreditation Program (ELAP)~~ using chain of custody procedures.

Re-useable sampling equipment (hand augers, shovels, etc.) will be decontaminated using the following steps to reduce the potential for cross-contamination.

1. wash and scrub in non-phosphate detergent and potable water;
2. rinse in potable water; and
3. rinse in DI water and air dry

Investigation derived residuals, including decontamination water, shall be managed in accordance with regulatory requirements.

If PCBs are detected (or suspected) in soil, re-usable sampling equipment shall be decontaminated in accordance with 40 CFR 761.79. Liquid decontamination waste shall be handled in accordance with 40 CFR 761.79.



#### 5.4 STOCKPILE MANAGEMENT AND TESTING

During site grading or construction excavation work, excess soil spoils, including COC-impacted soil, may be generated that require temporary stockpiling. Stockpiled soil may either be returned to the soil interval from which the soil was encountered or may be transported off site for disposal.

If COC-impacted soil is encountered, the excavated COC-impacted soil shall be stockpiled on plastic sheeting with a minimum thickness of 10 mils to reduce the potential for spreading contamination on surface soil. Stockpiles shall be covered at the end of the work day with plastic sheeting to reduce the potential for erosion or direct contact with storm water and to prevent unauthorized access. Plastic sheeting shall be weighted down to prevent the pile from being uncovered by wind. In addition to plastic sheeting covers, stockpiles should be managed to minimize migration of contaminated soils, and may include proper sloping to prevent run-on and infiltration of storm water, appropriate compaction to maintain stockpile integrity, and adequate security for the site to deter trespassers.

Stockpiled soil containing total PCBs at concentrations greater than 50 mg/kg or higher must be stored in accordance with 40 CFR 761.65. Soil containing PCBs shall be stored on site no longer than 30 days.

If the stockpiled, COC-impacted soil is to be transported off site for disposal, the soil shall be profiled for waste characteristics. For disposal purposes and profiling for PCBs, soil samples shall be collected in-place (e.g., in-ground) for PCBs prior to excavation (not from stockpiles). For other COCs (TPH, VOCs or metals), or from stockpile samples may be collected for waste profiling purposes for other constituents. Waste profiling shall consist of collecting soil samples (in-ground or from stockpiles) for laboratory analyses at the following minimum frequency.

- One sample per 100 cubic yards excavated or less.
- Three samples per 100 to 500 cubic yards excavated.
- One sample per 500 cubic yards excavated up to 2500 cubic yards, or more, and then above 2500 cubic yards, one sample per 2500 cubic yards.

Sampling shall be conducted in conformance with the procedures stipulated by the supervising PG or PE. Soil samples shall be analyzed for the following constituents.

- TPH with carbon chain range quantification (TPHcc) using EPA Method 8015M (Modified);
- VOCs using EPA Method 8260B and field preservation Method 5035;

- PCBs using EPA Method 8082 (using soxhlet extraction method 3540C) (North Property only); and
- Metals using EPA Methods 6010/7242.

Other analyses may be required contingent on waste profiling requirements, receiving facility requirements, or other regulatory directives.

## 5.5 SITE ACCESS

Vehicle and personnel access to areas where potentially impacted soils are encountered shall be controlled. Caution tape, cones, fencing, steel plates, or other appropriate measures shall be used to clearly designate the active area and to prevent access by the public. Stockpiles of potentially impacted soil shall be secured to prevent unauthorized access.

## 5.6 IMPORT FILL SOIL REQUIREMENTS

If needed, any off-site soils brought to the site for use as backfill (import fill) must be tested in general conformance with the Department of Toxic Substances Control (DTSC), Information Advisory Clean Imported Fill Material document (DTSC, 2001). Import fill shall be tested for target compounds based on the location of the fill source area; however, as a minimum, the fill should be tested for the following constituents.

- TPHcc using EPA Method 8015;
- VOCs using EPA Method 8260B;
- PCBs using EPA Method 8082 (using soxhlet extraction method 3540C); and
- Title 22 metals using 6010B/7242.

Other analyses may be required contingent on the source of the import fill or recommendations by the supervising PG or PE. A minimum of one sample for laboratory analysis is suggested per 1000 tons of import fill per borrow site (single source). For quantities above 5000 tons of import fill per borrow site (single source), one sample for laboratory analysis is suggested per 5000 tons of import fill. For PCBs, import soil shall contain less than 1 mg/kg of total PCBs.

## 56.0 HEALTH & SAFETY REQUIREMENTS

Project personnel shall comply with all applicable federal, state, and local regulations, as well as the State of California Construction Safety Orders (Title 8). Additionally, if COC-impacted soil is encountered, personnel working in the COC impacted area must comply with Occupational Safety and Health Administration (OSHA) regulations specified in 29 CFR

1910.120 and CCR Title 8, Section 5192. A site-specific health and safety plan shall be prepared prior to the start of earth work.

## **67.0 LIMITATIONS**

This SMP does not address topics related to other chemicals or media that may be encountered during a redevelopment or future site activities, including but not limited to, demolition and construction debris, asphalt, concrete, asbestos-containing materials, and other affected media. If such materials are encountered, contractors and workers are responsible for complying with all applicable laws pertaining to the handling and disposal of these materials.

In preparing this SMP, Amec Foster Wheeler has relied upon certain information and representations obtained from documents prepared by others. To the extent that recommendations are based in whole or in part on such information, those conclusions are contingent on its accuracy and validity. Amec Foster Wheeler assumes no responsibility for any consequences arising from any information or condition that was concealed, withheld, misrepresented, or otherwise not fully disclosed or available to Amec Foster Wheeler.

This SMP is based on current known site conditions and current laws, policies and regulations. No representation is made to any present or future developer or property owner of the site, or portions of the site with respect to future site conditions, other than those specifically identified within this document.

Amec Foster Wheeler disclaims any responsibility for any unintended or unauthorized use of this SMP. Amec Foster Wheeler has not made any commitment to, or assumed any obligation or liability to any present or future developer, property owner, tenant, consultant, agent, contractor, user or other party owning or visiting the Site or portion of the Site based upon or arising out of implementation of this SMP. It is expressly understood that while this SMP is intended to provide guidance and establish a framework for the management of residual chemicals in deeper soils to protect human health and the environment, this SMP shall not create any warranties or obligations to Amec Foster Wheeler as to implementation, adequacy, or success of protective measures under this SMP.

## 8.0 REFERENCES

- AMEC Environment & Infrastructure, Inc. (AMEC), 2012a, Feasibility Study, Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California, May 7.
- AMEC, 2012b, Remedial Action Plan, Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California, June 28.
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- AMEC, 2013b, Phase V Completion Report, Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California, September 26.
- AMEC, 2013c, Phase III, IV, and VI Completion Report, Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California, October 7.
- AMEC, 2013d, Phase II Completion Report, Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California, November 7.
- Department of Toxic Substances Control, 2001, Information Advisory Clean Imported Fill Material.